

United States Courts
Southern District of Texas
FILED

OCT 19 2023

Nathan Ochsner, Clerk
Laredo Division

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

LAWRENCE (LARRY) W. SINCLAIR)

Plaintiff, Pro Se)

Case No. 5:23-CV-109

VS)

BRIAN MARK KRASSENSTEIN, et al)

Defendants.)

PLAINTIFF SUPPLEMENTAL BRIEFING PURSUANT TO COURTS ORDER

DATED OCTOBER 17, 2023 and AMENDED COMPLAINT

Come Now Plaintiff Lawrence (Larry) W. Sinclair, Pro Se in accordance with this Honorable Courts ORDER dated October 17, 2023 directing plaintiff submit supplemental briefing as to why this case should not be dismissed for lack of jurisdiction and plaintiffs Amended Complaint wherein citizenship of Defendant Forum Advertising LLC has been amended.

Plaintiff states this case should not be dismissed and has attached hereto for filing Plaintiffs Amended Complaint and states as follows:

1. As the to issue of Jurisdiction as it relates to defendant Forum Advertising

LLC plaintiff states Forum Advertising LLC has Two members as listed by the

State of Florida Secretary of State's Office Division of Corporations (A copy of

said Business filing is attached hereto as Exhibit A consisting of Three (3) pages) who are Brian Krassenstein and Edward Krassenstein; and

2. As noted in this Court's ORDER dated October 17, 2023 the court has found plaintiff has properly pled citizenship of defendants Brian Mark Krassenstein and Edward Lawrence Krassenstein as citizens of Florida for purpose of jurisdiction. As both sole members of defendant Forum have been established as citizens of Florida defendant Forum Advertising LLC citizenship is also that of Florida.

3. Plaintiff has attached hereto Plaintiffs **AMENDED COMPLAINT AND JURY DEMAND** in which Two (2) amendments have been made. The first being the address for defendant Edward Lawrence Krassenstein which was recently discovered to not be the address set forth on Annual Reports filed with the Florida Division of Corporations; and the second under Parties Number 5 Defendant Forum Advertising LLC noting Forum has Two members both of whom are defendants Brian Mark Krassenstein and Edward Lawrence Krassenstein.

WHEREFORE Plaintiff respectfully requests this Honorable Court FIND plaintiff has properly pled this Courts Jurisdiction as to ALL named defendants, authorize the case to proceed and GRANT plaintiffs pending Motion to Proceed in Forma Paupris sitting before the Court.

Dated: October 19, 2023,

Respectfully Submitted,



Lawrence (Larry) W. Sinclair

Plaintiff, Pro Se

Mailing Address

c/o 1520 Sherman Street

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EXHIBIT A



Department of State / Division of Corporations / Search Records / Search by Entity Name /

Detail by Entity Name

Florida Limited Liability Company

FORUM ADVERTISING LLC

Filing Information

Document Number L14000003100

FEI/EIN Number 46-4513869

Date Filed 01/07/2014

State FL

Status ACTIVE

Principal Address

15128 Anchorage Way
Fort Myers, FL 33908

Changed: 03/02/2016

Mailing Address

15128 Anchorage Way
Fort Myers, FL 33908

Changed: 03/02/2016

Registered Agent Name & Address

KRASSENSTEIN, BRIAN

15128 Anchorage Way
Fort Myers, FL 33908

Address Changed: 03/02/2016

Authorized Person(s) Detail

Name & Address

Title MGR

KRASSENSTEIN, BRIAN

15128 Anchorage Way
Fort Myers, FL 33908

Title MGR

KRASSENSTEIN, EDWARD
15231 INTRACOASTAL CT
FORT MYERS, FL 33908

Annual Reports

Report Year	Filed Date
2021	04/05/2021
2022	04/12/2022
2023	04/08/2023

Document Images

<u>04/08/2023 -- ANNUAL REPORT</u>	View image in PDF format
<u>04/12/2022 -- ANNUAL REPORT</u>	View image in PDF format
<u>04/05/2021 -- ANNUAL REPORT</u>	View image in PDF format
<u>01/18/2020 -- ANNUAL REPORT</u>	View image in PDF format
<u>05/19/2019 -- ANNUAL REPORT</u>	View image in PDF format
<u>03/26/2018 -- ANNUAL REPORT</u>	View image in PDF format
<u>04/30/2017 -- ANNUAL REPORT</u>	View image in PDF format
<u>03/02/2016 -- ANNUAL REPORT</u>	View image in PDF format
<u>01/10/2015 -- ANNUAL REPORT</u>	View image in PDF format
<u>01/07/2014 -- Florida Limited Liability</u>	View image in PDF format

2023 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L14000003100

Entity Name: FORUM ADVERTISING LLC

Current Principal Place of Business:

15128 ANCHORAGE WAY
FORT MYERS, FL 33908

Current Mailing Address:

15128 ANCHORAGE WAY
FORT MYERS, FL 33908 US

FEI Number: 46-4513869

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

KRASSENSTEIN, BRIAN
15128 ANCHORAGE WAY
FORT MYERS, FL 33908 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title	MGR	Title	MGR
Name	KRASSENSTEIN, BRIAN	Name	KRASSENSTEIN, EDWARD
Address	15128 ANCHORAGE WAY	Address	4921 SW 25TH PLACE
City-State-Zip:	FORT MYERS FL 33908	City-State-Zip:	CAPE CORAL FL 33914

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: EDWARD KRASSENSTEIN

MGR

04/08/2023

Electronic Signature of Signing Authorized Person(s) Detail:

Date